

Oregon Office of Energy
Preliminary Response to WREGIS Proposal
Nov. 10, 2003
Phil Carver

Due to the short time between the Oct. 31 WREGIS workshop and the Nov. 10 deadline for comments, these comments have not been reviewed by the Oregon Office of Energy or the Oregon Public Utility Commission. As such these comments are preliminary and represent only my thoughts. As the WREGIS proposal progresses, further discussions would be useful.

Overall, the Western Renewable Energy Generation Information System (WREGIS) seems workable. If green tags (a.k.a. renewable energy certificates) are to be successful, an ownership registry is essential. Otherwise, there is little protection from fraudulent double-selling. Oregon appreciates the funding or work by the California Energy Commission, the Center for Resource Solutions and the Western Governors' Association.

These following comments respond to the 14 questions in the Request for Comments handout from the Oct. 31 workshop.

1. The WREGIS system should not try to track exports of power among western states and provinces. If the closest point of interconnection of the project with California is needed for its portfolio standard, that can be included in the static information. By definition green tag and power sales are separate and should not be intermingled. If California needs power sales information, that should be kept separate from the standard WREGIS system, perhaps as an optional data field or separate database. Otherwise, power imports and exports among western states should not be part of the WREGIS system.

Imports and exports of green tags between WREGIS and other green tag registries should be an integral part of the system. There are interstate and international sales of green tags, so this element is needed to prevent double-counting between WREGIS and other systems.

2. On static information: Fuel source is not static for projects with fossil-fuel backup (e.g. solar thermal and biomass). This field should be updated monthly if possible. CO2 and other air emissions depend on fuel sources. Oregon needs emission data for the labels for its small customer renewable choice program (portfolio choice). Alternatively, timely annual updates may suffice (see #6 below).
3. Arizona apparently needs data for small customer-sited renewable generation and solar water heating. There are many issues that make this difficult, especially for a January 2005 rollout. This will require standards for reporting on unmetered systems and third-party verification for meter readings.

4. All meter readings should be third-party verified. As money is already changing hands on the power sales, this data must exist. Typically, it is collected by the utility or control area. The generators who wish to participate in WREGIS should be responsible for having their utility or control area electronically forward meter readings data to WREGIS. Other data may not require third-party verification. If so, the data should be subject to unannounced spot-checks. The credibility of any WREGIS data is only as good as the lowest-common denominator.
5. Please add geothermal fields for carbon dioxide and elemental sulfur (primarily as H₂S) and backup fuel emissions to the data base. These are used for Oregon retail labels. All emissions data would be optional, but should be subject to spot checks. Emissions rates per MWh should be updated annually each March.

The subcategories for biomass should (at a minimum) include: municipal solid waste, sewage treatment biogas, animal waste biogas, landfill gas, forestry waste and crop waste. These are in addition to the categories at the top of page 8 of the report. These categories likely have meaning to consumers of green tags. The first four technologies produce electricity in Oregon; the others are being considered.

6. As noted in #2 above fossil fuel use should be updated monthly. Alternatively, all data could be updated annually by March for the previous calendar year, with emissions data available at that time as well. This is when data are needed to update Oregon labels.
7. see #6 above.
8. Offsets or allowance data are not standardized and should not be an active field for the WREGIS data base. It would be OK to have an unused field that could later be activated if renewable electricity CO₂ offsets are issued by states or become standardized.
9. Offsets should not be disaggregated within the WREGIS. If the owner of the green tag wishes to sell attributes separately, that tag should be retired from WREGIS.
10. See #1 above.
11. The safest way to deal with time-stamp issues is to require the hour and date of the generation. Projects below one MW would have multiple hours for each 1 MWh green tag. Any other method might require costly reprogramming.
12. A non-political non-profit organization would be preferable, but may not be essential.
13. Page 51 of the report indicates that "... each state will be responsible for overseeing and maintaining the quality of the data from that state." This is unrealistic for most states. Oregon has no funds to oversee data quality. This should be accomplished by

the WREGIS through third-party verification of generation MWh or spot checks of other data. Violators should be subject to WREGIS disciplinary action, including removal of all violator data from WREGIS. This will require procedures for spot checks and disciplinary decisions.

14. In Table 7, Oregon electricity disclosure labels do not include mercury, particulate matter (10 micron or less) or volatile organic compounds. There might be interest in mercury in the future. In Table 9, Oregon plans to discuss a greenhouse gas registry, so remove this item from the column "No serious interest at this time"